

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
FOI/PA# 1570163-000

Total Deleted Page(s) = 31

Page 38 ~ Duplicate;
Page 39 ~ Duplicate;
Page 42 ~ Duplicate;
Page 52 ~ Duplicate;
Page 53 ~ Duplicate;
Page 54 ~ Duplicate;
Page 55 ~ Duplicate;
Page 59 ~ b6; b7C; b7E;
Page 66 ~ Duplicate;
Page 67 ~ Duplicate;
Page 70 ~ Duplicate;
Page 73 ~ b6; b7C;
Page 74 ~ b6; b7C;
Page 77 ~ Duplicate;
Page 80 ~ Duplicate;
Page 93 ~ Duplicate;
Page 96 ~ Duplicate;
Page 109 ~ Duplicate;
Page 110 ~ Referral/Direct;
Page 112 ~ Duplicate;
Page 114 ~ Referral/Direct;
Page 115 ~ Referral/Direct;
Page 116 ~ Referral/Direct;
Page 117 ~ Referral/Direct;
Page 118 ~ Referral/Direct;
Page 119 ~ Referral/Direct;
Page 120 ~ Referral/Direct;
Page 121 ~ Referral/Direct;
Page 122 ~ Referral/Direct;
Page 123 ~ Referral/Direct;
Page 124 ~ Referral/Direct;

XXXXXXXXXXXXXXXXXXXXX
X Deleted Page(s) X
X No Duplication Fee X
X For this Page X
XXXXXXXXXXXXXXXXXXXXX

29A-4618-1

8/23/90

SEARCHED
SERIALIZED
INDEXED
FILED

X

(Rt. to Silvers)
File

FEB 08 '89 10:50 THE HOUSTON POST

P. 1

The Houston Post

NATION & WORLD

WEDNESDAY, February 8, 1989 **

Bush's son may be named
in suit involving failed S&LBy Peter Brummond
OF THE HOUSTON POST STAFF

While President Bush is talking tough about going after savings and loan wrongdoers, his son Neil may be named as a defendant in a possible lawsuit by the federal government involving a failed Denver savings and loan.

Neil Bush served as a director of Silverado Banking, Savings and Loan Association from 1985 to August 1988. Silverado failed in December 1988, at a cost to the Federal Savings and Loan Insurance Corp. of more than \$1 billion.

Bush stepped down as a director of Silverado one week after his fa-

ther won the Republican nomination for president and six weeks before Silverado, which had assets of \$2.3 billion, posted a \$198 million loss.

The National Thrift News and the Denver Post reported Monday that Silverado received preferential treatment from federal regulators, allegedly because of the political connections of some of the thrift's officers, directors and borrowers.

These connections included Neil Bush, Silverado chairman, Michael Wise, who was a member of the executive committee of the U.S. League of Savings Institutions, Larry Mizel, a leader in Colorado Republican circles, and Denver de-

veloper Bill Walters, according to the National Thrift News.

"If you are saying that there was influence because the son of the vice president was on the Silverado board, I would say definitely not," Neil Bush told the Denver Post.

One Silverado deal that the FSLIC is looking closely at, according to the Post, is the sale of preferred stock by former Colorado developer Kenneth Good to chairman Wise. In 1986, Wise bought 280 shares of preferred stock worth \$14 million from Good for \$4 million, the Post reported.

Good is now president of Gulf

Please see BUSH, A-18

BUSH: President's son
may be named in S&L suit

From A-27

Stream Line, an oil and gas company in Plantation, Fla., outside Miami. Neil Bush is a director of Gulf Stream, according to published reports.

In 1985, Gulf Stream borrowed more than \$80 million from Western Savings in Dallas, secured by undeveloped property in Florida. Western failed in September 1986, and was one of a group of failed Texas savings and loans, including Continental Savings and Vernon Savings, that was tied to convicted felon and reputed mob associate Herman K. Beebe Sr.

Good couldn't be reached for comment. The phone number for

Stream Line Florida offices were not answered Tuesday.

Explorations, an oil and gas company in Denver, were referred to the office of Bush's mother, Barbara, in Washington. Calls to that office were not returned.

Source close to the FSLIC said a lawsuit against the former officers and directors of Silverado is likely in the near future unless there is political pressure from above.

Lawrence J. White, one of the three members of the Federal Home Loan Bank Board, told the National Thrift News that Neil Bush's presence on Silverado's board would have no influence on any FSLIC action.

(Continued from page 1)

As reported, Silverado fueled many

In 1969 Mr. Wise started in the SAL

Discussing Silverado, Mr. Moroney, an analyst for the 10th District bank from May 1986 until December 1987, said "It

"Silverado wasn't handled any
only than any other theft in this dis-
she said.

At the end of September, Silver had \$629 million in advances from Topeka bank. It also had on its books million in brokered deposits.

Silverado, the former Mill Savings and Loan Association, was one of the few institutions in Denver for making large commercial real estate loans at a time when other financial institutions in the area were getting out of the market.

NTN associate
Paul Muolo contributed to this rep

09-17-98

(Mount Clipping in Space Below)

Congress taking a close look at company managing Silverado

Denver Post Staff and Wire Reports

WASHINGTON — First Nationwide Financial Corp., the Ford Motor Co. division now managing insolvent Silverado Banking, is drawing attention from Congress because of huge tax breaks it may earn from taking over sick thrifts.

First Nationwide, the nation's sixth-largest savings and loan, on Friday took over the management of \$2.4 billion Silverado, which will re-open this morning as Mile High Federal Savings.

Federal regulators have said they hope to sell Mile High, and First Nationwide is a likely bidder.

San Francisco-based First Nationwide also may be considering purchase of \$2.7 billion Columbia Savings of Englewood, another in-

solvent thrift that has agreed to let federal regulators sell or merge it. First Nationwide has expressed an interest in expanding in Colorado, but has declined to discuss details of its expansion plans.

Concern in Congress focuses on reports that the Ford subsidiary may attempt to acquire a network of sick thrifts throughout the country with assets of \$40 billion, including insolvent savings and loans in Texas, Illinois, Michigan and Ohio. First Nationwide and its parent, Ford, which has accumulated billions of dollars in cash reserves and which has reported record profits recently, could receive tax breaks between \$2 billion and \$4 billion, and, after the acquisitions, could become the largest savings

institution in the country.

Savings industry officials are also asking whether permitting a major industrial company like Ford to own the nation's largest savings and loan association would violate a longstanding principle that favors the separation of the banking system from control by industrial corporations.

"I think this raises real issues of concentration of economic power," said Sen. Tim Wirth, D-Colo., a member of the Senate Banking Committee. "And you have to ask the question, should we give Ford billions of dollars in tax breaks for taking over these institutions?"

Officials at First Nationwide have declined to comment.

(Indicate page, name of newspaper, city and state.)

The Denver Post
Date: December 12, 1988
Edition:

Title:

Congress taking a close look at company managing Silverado

Character:

or

Classification:

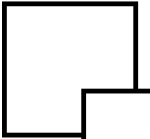
Submitting Office:

DENVER

Indexing:

b6
b7CSEARCHED
SERIALIZEDINDEXED
FILEDb6
b7C

9/17/89



b6
b7C

go

8p

*
* TRANSMISSION REPORT (FEB 10 '89) : 321 1500 *
*

* DATE START REMOTE TERMINAL MODE TIME PAGES RESULT
* FEB 10 11:19 FBI SA/D E G3T 01'55" 002 OK *

29A-468-2


SEARCHED	☐	INDEXED	☐
SERIALIZED	☐	FILED	☐
FEB 10 1989			
☐		☐	

Slut

☐

b6
b7C



Transmit attached by Facsimile

PRECEDENCE:

- ☐ Immediate
☒ Priority
☐ Routine

CLASSIFICATION:

- ☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☒ UNCLAS

To: DIRECTOR, FBI

From: SAC, DENVER (29-0)

Date 2/10/89

Subject: SILVERADO BANKING, SAVINGS AND LOAN ASSOCIATION
INFORMATION CONCERNING;

- ☐ Fingerprint Photo ☐ Fingerprint Record ☐ Map ☒ Newspaper clipping ☐ Photograph
☐ Artists Conception ☐ Teletype ☐ Other _____

Special handling Instructions:

Reference Denver Telcal of 2/10/89, SA [redacted] b6 b7C

[redacted] TO FBIHQ, SSA [redacted]

Approved [redacted]

PLEASE PROVIDE TO SSA

[redacted] Room

3841, EXT 5656, ECONOMIC
AND FINANCIAL CRIMES
UNIT.

FBI/DOJ

(Mount Clipping in Space Below)

Regulators ignored red flags as Silverado losses soared

By Mark Tatge

Denver Post Business Writer

The Federal Home Loan Bank of Topeka, Kan., gave Silverado Banking preferential treatment and shrugged off repeated warnings that Silverado was headed for a billion-dollar failure, according to James Maroney, a former official of the bank.

Maroney, a former supervisory agent, said last week that Kermit Mowbray, ex-president of the Topeka bank, relaxed federal thrift regulations, allowing now-defunct Silverado and other thrifts in his district to postpone hundreds of millions of dollars in loan losses.

"Silverado was a slow-motion accident that at all times was being viewed by the regulators," said Maroney, an attorney who now heads Ex Cathedra Inc., a Weatherford, Okla., consulting firm. "Silverado was always treated differently . . . We knew there were guidelines to be followed and there was to be preferential treatment."

Mowbray, who stepped down last month, has come under fire for relaxing regulations to give savings and loans in Colorado, Oklahoma, Nebraska and Kansas time to work out of deep problems tied to aggressive lending and a weak economy. The plan backfired, creating a multibillion-dollar problem in the Topeka district that aggravated the nation's thrift crisis.

In the case of Silverado, Maroney and thrift executives agree that Mowbray bent over backwards to help the thrift because of the political connections of the thrift's chairman, Michael Wise. Wise kept a high profile in national savings and loan circles. In addition, Neil Bush, son of President George Bush, served on Silverado's board from 1985 to August 1988.

"If you are saying that there was influence because the son of the vice president was on the Silverado board I would say definitely

not," Neil Bush said last week.

Others disagree.

"Kermit was basically politically in bed with Silverado, it was solicitous as hell," said one former Topeka bank official who worked with Mowbray. "Rather than rock the boat they let Silverado do whatever it wanted."

Interviews with former regulators and thrift executives indicate that federal regulators at the Topeka bank knew Silverado, with \$2.4 billion in assets, was in financial trouble in 1985, but neglected to take action against the savings and loan. Silverado failed in December 1988 and was sold, along with failed Columbia Savings, to Ford Motor Co.'s First Nationwide Bank unit. Silverado's failure will cost the Federal Savings and Loan Insurance Corp. more than \$1 billion.

(Indicate page, name of newspaper, city and state.) pp 1+106

The Denver Post

Date: Feb 5, 1989

Edition: Regulators ignored red
Title: flags as Silverado
losses soared

Character:

or

Classification: ()

Submitting Office: Denver

Indexing:

29A-4618-3

SEARCHED
SERIALIZED

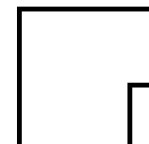
FEB 22 1989

b6
b7c

Bush



Mowbray



b6
b7C

2/00
00

FEDERAL HOME LOAN BANK OF TOPEKA

WHAT: One of 12 district banks that regulate and provide loans to more than 3,000 S&Ls nationwide; wholly owned by member institutions. S&L members sit on the Federal Home Loan district bank board. Operates similar to Federal Reserve System.

IN WASHINGTON: Federal Home Loan Bank Board sets regulations for district banks to follow; also responsible for Federal Savings and Loan Insurance Corp., the federal insurance fund protecting depositor's funds.

TOPEKA BANK'S REGULATION OF SILVERADO

■ Regulators slow to take action against Silverado Banking which showed signs of financial trouble as early as 1985.

■ Silverado Banking allowed to use questionable practices to restructure bad loans, possibly in violation of federal regulations.

■ Silverado Chairman Michael Wise regularly met with Topeka Bank President Kermit Mowbray hoping to keep the thrift's doors open.

■ Topeka bank lent Silverado millions of dollars, enabling the S&L to keep operating when it was in effect broke.

Silverado woes spotlight S&L troubles

SILVERADO from Page 1-G

Topeka Home Loan Bank officials deny that Silverado or any other thrift received special treatment, saying in a written response to inquiries from The Denver Post that, "Silverado was subjected to the same regulatory practices and processes as employed with other distressed thrifts."

But Maroney, who was responsible at the Topeka bank in 1986 for overseeing analysts that evaluated the financial condition of S&Ls, said bank officials looked the other way for years while Silverado used questionable accounting practices to book income and restructure problem loans.

Maroney was so concerned about the Topeka bank's poor regulation of Silverado and other thrifts in the 10th District that he flew to Washington late last year. Maroney, also a former Federal Deposit Insurance Corp. and Federal Reserve Bank regulator, met with Lawrence White, one of three members of the Federal Home Loan Bank Board. The Bank Board oversees the regional banks.

Regulatory problems

In the Dec. 13 meeting, Maroney said he discussed a series of regulatory problems that he saw while working at the Topeka bank. Last week White confirmed the meeting took place, but declined to disclose any details.

Two weeks after that meeting, Mowbray stepped down. White denies there is any connection.

The problems with Silverado and Topeka only spotlight one of the most serious financial crises in the nation's history. As Congress has focused its attention on the nation's savings and loan crisis, it has become apparent that the structure of the entire system is flawed.

"Thrift regulators, encouraged by Congress, have generally resisted closing failing savings and loans in hope that the fortunes of these institutions would reverse themselves," Sen. Timothy Wirth, D-Colo., told Colorado bankers last week.

"The thrift industry problem was accompanied by relaxation or even waiving of capital requirements for weak institutions, accounting techniques that hid the true condition of insolvent or weak institutions, and inadequate oversight and supervision."

In the case of the Topeka bank, Washington had been aware of problems years before Silverado failed. A former top regulator said Mowbray was sharply criticized by ex-Bank Board Chairman Edwin Gray, who headed the board from 1983-87.

"Of all the district banks, I would have to say that Topeka was the weakest link in the system," the former official said. "Kermit loved to be loved and I don't think you can be a regulator and expect to be loved."

The official added that Silverado Chairman Wise was a "fair-haired boy" from the U.S. League of Savings Institutions, the industry's top

trade group. Wise's role might have influenced Mowbray's decisions regarding Silverado, Maroney and others said.

Wise served on a number of powerful trade industry committees for the U.S. League and was considered to be a contender for president of the influential association.

Wise became close friends with Mowbray while serving as a director on the Federal Home Loan Bank of Topeka's board in 1984-85. Mowbray spoke before Silverado's top executives when the thrift held management retreats.

Noted for being a smooth talker and a sharp dresser, Wise, a former salesman of men's suits, never had any trouble getting Mowbray on the telephone. Wise also got the Topeka bank president's attention when it came to discussing Silverado.

Wise and his top executives would fly to Topeka four or five times a year in a private jet, and they were chauffeured to the bank's offices by a member of Mowbray's staff. The meetings with Mowbray started long before Silverado was publicly reporting troubles. But, after Silverado publicly reported its huge losses last year, Mowbray tried to distance himself from Wise.

Wise used the meetings to explain some of Silverado's more bizarre transactions. Regulators often didn't understand them and they had lots of questions.

"They'd go to Topeka and say here is our deal. It is non-recourse and we have the real estate for repayment if the debt isn't paid. But what they would fail to tell you was the real estate was worthless and so were the borrowers," said one former Silverado executive who worked with the thrift's commercial loans.

Borrowers would be lent not just the loan, but also the interest to pay the loan and the fees charged to make the loan. Silverado would book the fees and interest as income, but no cash would change hands. In many cases, the borrowers had little ability to repay the loans.

To generate cash, Silverado relied on hundreds of millions of dollars in federally insured deposits. Silverado also borrowed heavily from the Federal Home Loan Bank of Topeka to fund the loans and pay operating expenses.

By the mid-1980s, the commercial loans were starting to sour. Silverado became even more creative. "Buddy" borrowers were found to take over the troubled properties and new loans were made to keep the projects afloat. The new loans generated income, but the loans would never be repaid.

To avoid having to take losses, Silverado liberally applied accounting rules governing the restructuring of problem properties while the Topeka bank looked the other way, former federal regulator Maroney said.

Bad loans were not counted as bad loans, they were now counted

as "restructured" paying loans. The practices, which were designed to buy time until Colorado's economy improved, distorted Silverado's financial condition.

Meanwhile at the Topeka bank, Mowbray was firmly supporting Silverado. He liked Wise and wanted to avoid any embarrassments. Neil Bush was on the thrift's board; Wise was well known nationally and was rumored to be a candidate for the chairmanship of the Federal Home Loan Bank Board if George Bush won the '88 election.

But Mowbray's examination staff saw that Silverado was deteriorating rapidly. The issue was brought to Mowbray's attention by a supervisory agent who worked with Maroney. The agent said that Silverado's loans raised serious concerns. Mowbray snapped back that the analyst "had better get his facts straight."

Supervisory accord

Not until October 1987 did federal regulators finally decide it was time to step in and put Silverado under a supervisory agreement restricting its operations.

"I'd say that we had some reservation about some of the transactions ... but they were well supported by business plans," said David Paul, Colorado savings and loan commissioner. "It became clear in 1987 that the institution had problems, but we can't make them undo the loans they made. We can only insist they make changes in the future."

But Ernst and Whinney, Silverado's auditor, took action much sooner. The accounting firm resigned in 1986 amid a dispute with Silverado over the treatment of troubled loans.

It wasn't the first time that questions were raised about Silverado, nor would it be the last. Silverado's

questionable loan-for-stock deals are currently being investigated by the FSLIC attorneys to see if the thrift's executives fraudulently used depositor's funds.

To rebuild its sagging capital, Silverado lent borrowers millions of dollars on the condition that they use some of the loans' proceeds to buy stock in the ailing institution. Denver developer Bill L. Walters was one of Silverado's biggest stockholders, often turning to the thrift to either unload properties or restructure loans.

Another deal that FSLIC is looking at closely involved the resale of preferred stock owned by former Colorado developer Kenneth Good. In 1986, Silverado Chairman Wise bought 280 shares of preferred stock worth \$14 million from Good for \$4 million.

"I don't think I care to comment on why I did or why I didn't. I had been trying to sell the stock for several years and he (Wise) was the only buyer," said Good, who now is president of Gulf Stream Land & Development Corp., Plantation, Fla.

Wise, who now works for hotel entrepreneur Jack DeBoer in Wichita, Kan., didn't return telephone calls.

If FSLIC does decide to sue Wise and other former directors and officers of Silverado, the former officials may have a problem on their hands. Silverado's insurance policy that covers officers and directors expired in July 1986. The insurance wasn't renewed, but Silverado did establish a fund of \$15 million to cover future damages.

Silverado also doesn't have any insurance to cover fraudulent acts, because the policy covering fraud expired last May. FSLIC may end up with the Silverado's bad loans as its only source to cover the \$1 billion it spent to cover the thrift's deposits.

Federal Home Loan Bank Board



1700 G Street, N.W.

Washington, D.C. 20552

Federal Home Loan Bank System

Federal Home Loan Mortgage Corporation

Federal Savings and Loan Insurance Corporation

MEMORANDUM

TO: File

FROM:



Office of Enforcement

SUBJECT: Meeting and Release of
Information to the FBI

FBI agent [redacted] on December 12, 1988, requested a meeting with [redacted] of the FHLBank of Topeka, in order to receive oral information and further explanation regarding Silverado Banking, Savings and Loan Association, Denver, Colorado. Information provided at this meeting may be derived from or consist of financial records of customers of federally-insured financial institutions. I hereby certify that (a) there is reason to believe that these records may be relevant to a violation of federal criminal law, and (b) the records were obtained in the exercise of this agency's supervisory or regulatory functions.



Office of Enforcement

b6
b7C

b6
b7C

b6
b7C

29A-4618-4

SEARCHED	INDEXED
SERIALIZED	FILED
FEB 22 1989	

[redacted]

b6
b7C
(X)

Federal Home Loan Bank Board



1700 G Street, N.W.
Washington, D.C. 20552

Federal Home Loan Bank System
Federal Home Loan Mortgage Corporation
Federal Savings and Loan Insurance Corporation

MEMORANDUM

TO: File

FROM: [REDACTED]
Denver Field Manager

SUBJECT: Meeting and Release of
Information to the FBI

FBI agent [REDACTED] on December 12, 1988, requested a meeting with [REDACTED] of the FHLBank of Topeka, in order to receive oral information and further explanation regarding Silverado Banking, Savings and Loan Association, Denver, Colorado. Information provided at this meeting may be derived from or consist of financial records of customers of federally-insured financial institutions. I hereby certify that (a) there is reason to believe that these records may be relevant to a violation of federal criminal law, and (b) the records were obtained in the exercise of this agency's supervisory or regulatory functions.

[REDACTED]
Denver Field Manager

b6
b7C

b6
b7C

b6
b7C

1823 Byron G. Rogers
Federal Building
Denver, Colorado 80202
January 20, 1989

[redacted]
[redacted] Office of Enforcement
Federal Home Loan Bank Board
Washington, D.C.

b6
b7C

Dear [redacted]

In connection with an official investigation by the FBI, I hereby request that records in the possession of the Federal Home Loan Bank of Topeka and the Federal Home Loan Bank Board be made available to me concerning Silverado Banking Savings & Loan Association, Denver, Colorado.

Sincerely yours,

Robert L. Pence
Special Agent in Charge

By: [redacted]
Supervisory Special Agent

1 - Addressee

1 - cc: [redacted]

Supervisory Agent
Federal Home Loan Bank of Topeka
Topeka, Kansas

b6
b7C

1 - Denver (29A-NEW)



Searched [redacted]

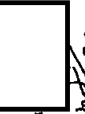
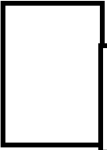
Serialized [redacted]

Indexed [redacted]

Filed [redacted]

29A-4618-5

b6
b7C



b6
b7C

~~123~~
123

FEDERAL HOME LOAN BANK BOARD CRIMINAL REFERRAL FORM

SECTION A TO BE COMPLETED FOR ALL CRIMINAL REFERRALS

1. Name, Location and Docket Number of Financial Institution

Name Silverado Banking, Savings and Loan Association

Location 3900 East Mexico
Street

Denver
City

CO
State

80210
Zip

Docket Number 05871

If activity occurred at branch office(s), please identify _____

2. Asset Size of Financial Institution 2,283

3. Approximate date and dollar amount (prior to any allowance for restitution or recovery) of suspected violation

Date _____
Month Day Year

Amount _____

4. Summary characterization of the suspected violation. Check appropriate box(es)

☐ Defalcation/Embezzlement

☒ False Statement

☐ Check Kiting

☒ Bank Fraud

☐ Bribery/Gratuity

☐ Misuse of Position
or Self Dealing

☐ Unexplained Loss

☐ Credit Card Fraud

☐ Bank Secrecy Act/Money Laundering

☐ Other (Describe) _____

5. Has there been any admission or a confession?

☐ Yes ☒ No If so, by whom? _____

6. Explanation/Description of Suspected Violation (Give a brief summary of the suspected violation, explaining what is unusual or irregular about the transaction.) (If necessary, use Continuation Sheet.)

See attached

b6
b7C

29-0-572, 29-0-573
SILVERADO BANKING, SAVINGS & LOAN ASSOC. - VICTIM;
DENVER, CO.
BE-E
CO. IN

OKA
2-22-89

2/22/89
1 BILLION
EXPOSURE-FSLIC
125 MILLION FRAUD

29A-46126
SEARCHED
SERIALIZED
FEB 22 1989
DEX
LED
VI

b6
b7C



b6
b7C



8/23/92

1001

FEDERAL HOME LOAN BANK BOARD
CRIMINAL REFERRAL FORM

FHLB SCKET NUMBER OF
THE FINANCIAL INSTITUTION 05871

SECTION A - CONTINUED
TO BE COMPLETED FOR ALL REFERRAL CASES

7. Person(s) Suspected of Criminal Violation (If more than one, use Continuation Sheet.)

b6
b7C

a. Name
First Middle Last

b. Address Dallas TX 75231
Street City State Zip

c. Date of Birth Unknown Social Security Number Unknown
(if known) Month Day Year (if known)

d. Relationship to the financial institution. Check all applicable box(es)
☐ Officer ☐ Agent ☐ Stockholder
☐ Director ☐ Appraiser ☐ Accountholder
☐ Employee ☒ Borrower ☐ Other, Specify

e. Is person still affiliated with the financial institution? ☐ Yes ☒ No
If no, ☐ Terminated ☐ Resigned Date
Month Day Year

If no, describe circumstances. (If necessary, use Continuation Sheet.)
Institution placed into receivership December 9, 1988.

f. Prior or related referrals? ☒ Yes ☐ No If yes, please identify See attached referral to IRS
concerning suspected tax evasion.

g. Is person affiliated with any other financial institution? ☐ Yes ☒ No
or business enterprise? ☒ Yes ☐ No If yes to either or both, please identify
 is a principal in a number of land development partnerships
and corporations in Texas.

b6
b7C

8. This matter is being referred to the ☒ FBI
☐ Secret Service ☐ IRS (Check one) in Denver CO
City State
and the U.S. Attorney in Denver CO Unknown
City State Judicial District (if known)

9. Offer of Assistance
The individuals listed below are/will be authorized to discuss this referral with FBI and Department
of Justice officials and to assist in locating or explaining any documents pertinent to this referral,
provided that contact is first made with

Name Position
Phone No.

Authorized Individuals any of the following may speak without further authorization.
Name Phone No.
Name Phone No.
Name Phone No.

b6
b7C

10. Form Prepared By
Position
Agency/Institution Federal Home Loan Bank of Topeka
Phone No. Date 02 16 89
Month Day Year

b6
b7C

ATTENTION
COMPLETE SECTION B OF FHLBB FORM 366 AND SUBMIT WITH THIS SECTION IN ALL CASES WHERE SUSPECTED
CRIMINAL ACTIVITY INVOLVES PROBABLE LOSS (BEFORE REIMBURSEMENT OR RECOVERY) OF \$10,000 AND GREATER
OR IN ALL CASES, REGARDLESS OF AMOUNT, INVOLVING AN AFFILIATED PERSON WITHIN THE MEANING OF 12 C.F.R.
§ 561.29.

**FEDERAL HOME LOAN BANK BOARD
CRIMINAL REFERRAL FORM**

FEDERAL DOCKET NUMBER OF
THE FINANCIAL INSTITUTION _____

SECTION B

TO BE COMPLETED IN REFERRAL CASES WHERE SUSPECTED CRIMINAL ACTIVITY INVOLVES PROBABLE LOSS (BEFORE REIMBURSEMENT OR RECOVERY) OF \$10,000 OR GREATER OR IN ALL CASES, REGARDLESS OF AMOUNT, INVOLVING AN AFFILIATED PERSON WITHIN THE MEANING OF 12 C.F.R. § 561.29.

1. Give a chronological and complete account of the suspected violation. (If necessary, use Continuation Sheet.)
 - Relate key events to documents and attach copies of those documents.
 - Explain who benefited, financially or otherwise, from the transaction, how much and how.
 - Furnish any explanation of the transaction provided by the suspect and indicate to whom and when it was given.
 - Furnish any explanation of the transaction provided by any other person.
 - Furnish any evidence of cover-up by the suspect or evidence of an attempt to deceive federal or state examiners or others.
 - Indicate where the suspected violation took place (e.g., main office, branch, other).
 - Recommend any further investigation that might assist law enforcement authorities in fully examining the potential violation.

2. Indicate whether the suspected violation appears to be an isolated incident or whether it relates to other transactions. (Explain)

3. Exclusion of Information from the Referral

Has any pertinent information been excluded from this referral as a result of any legal or other restraint? ☐ Yes ☐ No If yes, why? _____

Have the excluded information or documents been segregated for later retrieval? ☐ Yes ☐ No

**FEDERAL HOME LOAN BANK BOARD
CRIMINAL REFERRAL FORM**

FH... DOCKET NUMBER OF
THE FINANCIAL INSTITUTION _____

SECTION B

TO BE COMPLETED IN REFERRAL CASES WHERE SUSPECTED CRIMINAL ACTIVITY INVOLVES PROBABLE LOSS (BEFORE REIMBURSEMENT OR RECOVERY) OF \$10,000 OR GREATER OR IN ALL CASES, REGARDLESS OF AMOUNT, INVOLVING AN AFFILIATED PERSON WITHIN THE MEANING OF 12 C.F.R. § 561.29.

4. Witnesses

List any witnesses who might have information about the suspected violation and describe their position or employment. Indicate whether they have been interviewed. (If necessary, use Continuation Sheet.)

	<u>Name</u>	<u>Position</u>	<u>Address</u>	<u>Phone No.</u>	<u>Interviewed?</u>	
					Yes	No
a.	_____	_____	_____	_____	☐	☐
b.	_____	_____	_____	_____	☐	☐
c.	_____	_____	_____	_____	☐	☐
d.	_____	_____	_____	_____	☐	☐
e.	_____	_____	_____	_____	☐	☐

5. Discovery and Reporting

a. Who discovered the suspected violation and when? see attached

b. Has the suspected violation been reported to the Board of Directors? ☐ Yes ☐ No
By whom and when? The Board of Directors approved the loan.

c. Has the Board of Directors taken action? ☐ Yes ☒ No If so, what and when?
Silverado is now in receivership.

d. Has the suspected violation previously been reported to federal or local law enforcement authorities or to any federal or state supervisory agency? ☒ Yes ☐ No If so, by whom, to whom, and when?
See attached.

6. Loss	a. Amount of loss known	\$	f. Name of surety bond company
	b. Restitution by :	\$	
		\$	
	c. Settlement by surety company	\$	
	d. Total restitution and settlement to date	\$	
	e. Total loss to date	\$	g. Amount of bond \$
			h. Amount of deductible \$
			i. Was claim filed? ☐ Yes ☐ No if yes, when
			j. Is additional loss suspected? ☐ Yes ☐ No (If yes, explain in Item 1, Section B.)

7. Has the suspected violation had a material impact on or otherwise affected the financial soundness of the institution? ☒ Yes ☐ No If yes, please explain.

See attached.

CONTINUATION SHEET

FHL BOX NUMBER OF
THE FINANCIAL INSTITUTION _____

ITEM NO.	REMARKS

The [redacted] loan" is the largest credit ever underwritten by Silverado. Due to a default by the borrower, Silverado suffered a loss of \$41.4 million, as of September 30, 1988. A brief chronology of the credit's history follows.

b6
b7C

At a March 10, 1987 meeting with Silverado's directorate, the Supervisory Agent issued a supervisory directive to Silverado that prohibited Silverado Financial Corporation ("SFC") (the insured institution's holding company) Silverado, or any subsidiary thereof from funding, directly or indirectly, the acquisition of any securities (including any SFC or Silverado stock or participation interests in the Loan Pool) of SFC, Silverado, or any subsidiary.

Silverado management assured the Supervisory Agent that no legally binding commitments existed on March 10, 1987 which involved sales of stock, though one transaction involving the sale of a junior participation interest had been committed to. The Supervisory Agent requested that Silverado submit a legal opinion to support that position, and to provide detail on the transaction. Silverado's in-house legal counsel submitted the requested legal opinion on binding commitments on March 11, 1987. Subsequent administrative proceedings have determined that no written loan commitment existed prior to March 10, 1987.

The loan commitment was to SDC Land Partners, Ltd., a Texas limited partnership of which the corporate general partner is Sullivan Development Company (an entity of which [redacted] [redacted] and was in the amount of \$73.8 million. This loan was to be secured by a second deed of trust on approximately 330 acres of undeveloped land in Fort Worth, Texas (behind a \$40 million first deed). The loan was closed on March 27, 1987 pursuant to the outstanding commitment.

b6
b7C

Approximately \$17.8 million in loan proceeds was to be used to purchase undivided junior and subordinated interests in a pool of Silverado loans. Additionally, the borrower received \$23 million in cash at closing. It is our current understanding that the proceeds of the cash disbursement may subsequently have been used to establish trusts situate in the Grand Cayman Islands and/or extinguish borrowings on a line of credit which was used to fund the construction of [redacted] personal dwelling.

b6
b7C

Although the loan had already closed, the Supervisory Agent notified Silverado by letter on April 3, 1987, that while it appeared that a legally binding commitment existed for this loan, the basic underwriting for the loan was questionable and that additional supervisory comment would be forthcoming after the examiners had specifically reviewed this credit during the then ongoing examination. An appraisal subsequently ordered by the FHLB

of Topeka on the collateral property for this loan showed an indicated loss of \$41 million, which Silverado has recognized on its books pursuant to a directive by the Supervisory Agent.

On June 8, 1988, Silverado notified the Supervisory Agent of a default on a \$74.8 million loan Silverado had extended to SDC Land Partners, Ltd. (approximately \$52 million had been funded to date). The default occurred due to a failure by [redacted] SDC Land Partners, Ltd., to make a \$3 million payment on a \$36 million loan from FirstRepublic Bank that had a prior position on the collateral securing Silverado's loan.

b6
b7C

The Supervisory Agent and Agency Functions' Legal Counsel met with Silverado on June 10, 1988 to discuss this default and Silverado's workout alternatives. The Supervisory Agent took no objection to a foreclosure and directed Silverado to put the loan on a nonaccrual basis for income reporting purposes. The Supervisory Agent noted that the information provided at the meeting indicated that the loan was an in-substance foreclosure, and directed Silverado to establish a specific reserve of \$42.6 million against the loan.

The creation of this specific reserve was supported by the reappraisals of the underlying four properties collateralizing the loan which were ordered by the Federal Home Loan Bank of Topeka. On the primary piece of real estate securing Silverado's loan, the FHLB of Topeka ordered reappraisal indicated a value of \$40 million as opposed to the \$121 million value indicated by the appraisal used by Silverado to underwrite the original loan.

On July 19, 1988, Agency Functions' Legal Counsel submitted a memorandum to the Director of the Federal Home Loan Bank Board's Office of Enforcement setting forth the questionable aspects of Silverado's loan to SDC Land Partners, Ltd. and interrelated dealings, and requesting that the formal examination pursuant to Section 407(m)(2) be expanded to include a detailed review of these matters.

At an August 9, 1988 meeting with Silverado's appraisers, they admitted that the current value of the property was considerably less than their original value. Moreover, it has been learned that [redacted] had withheld a sales contract from the appraisers that would have adversely impacted the appraisers' assigned value had they known about it. One clear consequence of a lower value would have been a decrease in the amount of money Silverado could have lent on the project. Naturally, a smaller loan would have resulted in a smaller loss to Silverado. Other questionable aspects of the property appraisals included the existence of substantially current appraisals on the subject property which were held by the first deed of trust holder, First Republic Bank, and which reflected a significantly lower appraised value for the collateral property.

b6
b7C

If the borrower knew of the existence of this appraisal, the gross disparity between these two essentially concurrent appraisals necessarily raises the specter of a fraudulent loan application predicated upon the existence of false appraisal report. The reported diversion of funds to [redacted] personal benefit is certainly consistent with this theory.

b6
b7C

In August and September 1988, Silverado attempted to work out an arrangement with [redacted] whereby Silverado would release [redacted] from all claims in return for deeds to the subject property. The Supervisory Agent objected to this arrangement on October 17, 1988 and notified Silverado that foreclosure was the only alternative presented to which supervisory objection would not be taken. The Supervisory Agent also requested written confirmation that [redacted] and related entities were not receiving any form of disbursements from Silverado's loan to SDC Land Partners, Ltd. Silverado has subsequently initiated a foreclosure action and confirmed that disbursements to [redacted] were not being made.

b6
b7C

On December 9, 1988, Silverado was placed into a receivership.

Federal Home Loan Bank Board



1700 G Street, N.W.

Washington, D.C. 20552

Federal Home Loan Bank System

Federal Home Loan Mortgage Corporation

Federal Savings and Loan Insurance Corporation

3 March 1989

[redacted] Esquire
Chief Deputy U. S. Attorney
Office of the United States Attorney
for the District of Colorado
1961 Stout Street, 12th Floor
Denver, CO 80202

b6
b7C

Re: Referral of Allegations Concerning
[redacted]

Dear [redacted]

b6
b7C

I write to confirm the telephone conversation in which I advised you of rumors concerning the conduct of [redacted] formerly Executive Director of the Federal Savings and Loan Insurance Corporation. As I told you, we have heard reports that, shortly before the Federal Home Loan Bank Board appointed FSLIC as receiver of Silverado Banking, Savings and Loan Association, Denver, Colorado, [redacted] telephoned someone at Silverado and advised them that some form of FSLIC action was forthcoming and that it might be advisable to purge from Silverado files any potentially embarrassing material concerning the conduct of [redacted]

b6
b7C

[redacted] At all times during which [redacted] might have made such a call, the Office of Enforcement was conducting a formal examination of Silverado pursuant to Section 407(m)(2) of the National Housing Act, 12 U.S.C. § 1730(m)(2). If this story is true, then [redacted] has violated the regulations of the FHLBB, 12 C.F.R. §§ 505.5(a), 511-735.19, and possibly provisions of the criminal code, 18 U.S.C. §§ 1505, 1905. This information has also been conveyed to [redacted] Deputy Chief, Fraud Section, Criminal Division, U. S. Department of Justice.

The Office of Enforcement made limited inquiries concerning this rumor, but did not obtain any information to substantiate it and could not determine its source. On [redacted] [redacted] advice, we did not contact [redacted]

b6
b7C

29A-4618-7

SEARCHED	INDEXED
SERIALIZED	FILED
MAR 7 1989	
[redacted]	

[redacted]

b6
b7C

b6
b7C
4/8

I enclose for your information a copy of an article that appeared in this morning's Washington Post, on the first page of the Business section. If you have any questions or require further information, please feel free to call.

Yours sincerely,

[Redacted Signature]

Associate Deputy Director
Office of Enforcement

[Redacted Title]

b6
b7C

cc: [Redacted Name] Esquire

b6
b7C



STUART ROOT
... denies he gave warning to S&L

Probe Targets Former Head Of FSLIC

*Tip of S&L Takeover
Is Focus of Inquiry*

By Kathleen Day
Washington Post Staff Writer

The Justice Department is investigating allegations that a former top savings and loan regulator tipped off a failing S&L that the government would soon close it down, government officials confirmed yesterday.

S&L regulators have asked the Justice Department to investigate whether Stuart Root, who headed the Federal Savings and Loan Insurance Corp. until a few weeks ago, warned officials at Silverado Banking, Savings and Loan Association of Denver that the government would step in Dec. 9.

Root denies giving advance word of the takeover to Silverado.

President Bush's son Neil was a director of the thrift until last August, but there is no indication that he is being mentioned in any allegations of wrongdoing. He could not be reached for comment.

To guard against employees destroying or moving documents or from withdrawing deposits, federal

See ROOT, G4, Col. 3

Justice Dept. Probes Former Director of FSLIC

ROOT, From G1

law bars government officials from telling financial institutions in advance that the government is about to take them over.

"It is a crime for a federal employee to disclose either financial or marketing information," said Karl Hoyle, a spokesman for the Federal Home Loan Bank Board, the agency that regulates S&Ls. FSLIC is a unit of the bank board.

Hoyle would not say when the Silverado matter was referred to the Justice Department, only that it had been done in the 12 weeks since the institution was closed. Hoyle said the bank board heard the allegations about Root "from a variety of places, from people within and without the bank board system."

"In tracking down those things it never got beyond rumor and innuendo," Hoyle said. "We never found any thread of substance. But because of the gravity of the allegations we referred it to Justice. There's been a series of ongoing referrals on Silverado." He declined to elaborate on the other referrals.

Although Hoyle said the bank board investigated the allegations about Root before turning the matter over to the Justice Department, Root said yesterday that he was never questioned by the bank board about the allegations and first learned of the Justice Department investigation when a reporter asked him about it.

"No one ever questioned me about giving prior notification to Silverado and I did not give prior notification," Root said.

The Justice Department had no comment on the matter.

"There were clear indications officials knew we were coming," said one bank board official who was involved in the takeover of Silverado and who asked not to be identified. "There was a memo in the institution that went out to top [Silverado] staff in the morning indicating the closure would take place that day."

"The memo went out and desks were cleaned off," the bank board official said. "Executive officers—the tops of their desks were clean by the time we got there. There were lots of hours, lots of time to remove documents if there was a desire."

After Silverado was taken over, it was renamed Mile High Federal Savings and Loan and was operated by the government until Dec. 30, when the thrift and four others were sold to a unit of the Ford Motor Co. with \$1.6 billion in federal assistance.

As the director of the FSLIC last year, Root was in charge of committing an estimated \$60 billion in federal funds over the next 10 years to investors who took ailing S&Ls such as Silverado off the government's hands. The deals have been criticized by Congress and the Bush administration

for being too expensive for the government.

Since leaving the FSLIC, Root has formed a financial consulting firm. The president of the company is David Carmen, the son of Gerald Carmen. Gerald Carmen is head of the Federal Asset Disposition Association, a unit of FSLIC that manages real estate the government inherits from failed S&Ls.

Carmen has announced he will resign from FADA in a few days.

"It is my hope that Gerald Carmen will join us," Root said yesterday.

File - Serial Charge Out
FD-5 (Rev. 6-17-70)

File _____ Class. _____ Case No. _____ Last Serial _____ Date _____

Class.

Case No.

Last Serial

Date

☐ Pending

☐ Closed

Serial No.

Description of Serial

Date
Charged

Serial 8 (news article)
placed in 57B-H

Permanent Charge Out

Employee

RECHARGE

Date _____

To _____ From _____

Initials of
Clerk {

Date {

Date charged

Employee

Location



U.S. Department of Justice
Federal Bureau of Investigation

In Reply, Please Refer to
File No.

Denver, Colorado
April 3, 1989



SILVERADO BANKING,
SAVINGS AND LOAN ASSOCIATION,
DENVER, COLORADO - VICTIM;
BANK FRAUD AND EMBEZZLEMENT

b6
b7C

On February 22, 1989, a Criminal Referral Form was received in the Denver Field Office of the FEDERAL BUREAU OF INVESTIGATION. This Criminal Referral Form was prepared by [redacted] FEDERAL HOME LOAN BANK OF TOPEKA, business telephone number [redacted]

The aforementioned Criminal Referral Form indicated that the loan to [redacted] accomplished by SILVERADO BANKING, SAVINGS AND LOAN (SILVERADO) was the largest credit ever underwritten by SILVERADO. As a result of the default by the borrower, SILVERADO suffered a loss of \$41.4 million as of September 30, 1988. A brief chronology of the credit history is as follows:

b6
b7C

The loan commitment was to SDC LAND PARTNERS, LIMITED, a Texas limited partnership of which the corporate general partner was SULLIVAN DEVELOPMENT COMPANY. SULLIVAN DEVELOPMENT COMPANY is an entity of which [redacted]

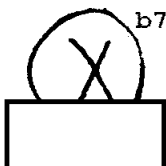
[redacted] The original loan commitment was in the amount of \$73.8 million dollars, which loan commitment was to be secured by a second deed of trust on approximately 330 acres of undeveloped land in Fort Worth, Texas. This 330 acres of undeveloped land in Fort Worth, Texas had an outstanding \$40 million first deed on it. The loan was closed on March 27, 1987, pursuant to this outstanding commitment.

b6
b7C

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

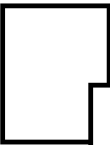
Searched [redacted]
Serialized [redacted]
Indexed [redacted]
Filed [redacted]

b6
b7C



29A-4618- (1-SUB BA)

29A-4618-9



b6
b7C

8/2/90

[REDACTED]

b6
b7C

Approximately \$17.8 million in loan proceeds were to be used to purchase undivided junior and subordinated interests in a pool of SILVERADO loans. Additionally, the borrower received \$23 million in cash at closing. The Criminal Referral Form alleges that the proceeds of the cash disbursements may subsequently have been used to establish trusts that were situated in the Grand Cayman Islands, and/or extinguish borrowings on a line of credit which was used to fund the construction of [REDACTED] personal dwelling.

b6
b7C

An appraisal subsequently ordered by the FEDERAL HOME LOAN BANK BOARD OF TOPEKA on the collateral property for this loan showed an indicated loss of \$41 million, which SILVERADO had already recognized on its financial books pursuant to a directive by the supervisory agent of the FEDERAL HOME LOAN BANK BOARD.

On June 8, 1988, SILVERADO officials notified the supervisory agent of the FEDERAL HOME LOAN BANK BOARD of a default on this \$73.8 million loan that SILVERADO had extended to SDC LAND PARTNERS, LIMITED. Approximately fifty two million dollars of the \$73.8 credit line had been funded to date. The default occurred due to a failure by [REDACTED] SDC LAND PARTNERS, LIMITED to make a \$3 million payment on a \$36 million loan that had been received from FIRST REPUBLIC BANK, which had a prior position on the collateral that secured SILVERADO's loan.

b6
b7C

The supervisory agent directed SILVERADO officials to establish a specific reserve of \$42 million against this loan. The creation of this specific reserve was supported by the reappraisals of the underlying four properties collateralizing the loan. On the primary piece of real estate securing SILVERADO's loan, the FEDERAL HOME LOAN BANK BOARD OF TOPEKA ordered reappraisal, which indicated a value of \$40 million as apposed to the \$121 million value indicated by the appraisal used by SILVERADO to underwrite the original loan.

At an August 9, 1988, meeting with SILVERADO's appraisers, the appraisers admitted to the supervisory agent of FEDERAL HOME LOAN BANK BOARD that the current value of the property was considerably less than their original value.

[REDACTED]

b6
b7C

Moreover, it had been learned that [REDACTED] had withheld a sales contract from the appraisers that would have adversely impacted the appraisers assigned value had they known about it. One clear consequence of a lower value would have been a decrease in the amount of money SILVERADO could have lent on the project. Other questionable aspects of the property appraisals included the existence of substantially current appraisals on the subject property which were held by the first deed of trust holder, FIRST REPUBLIC BANK, which reflected a significantly lower appraised value for the collateral property.

Subsequently, SILVERADO officials initiated a foreclosure action against [REDACTED] SDC LAND PARTNERS, LIMITED concerning the collateralized property.

b6
b7C

On December 9, 1988, SILVERADO was placed into a receivership. To that date, due to the default by the borrower, SILVERADO suffered a loss of \$41.4 million as of September 30, 1988.

On April 3, 1989, the above fact scenario was presented to Assistant United States Attorney (AUSA) [REDACTED] who requested further investigation to substantiate the aforementioned allegations against [REDACTED] SDC LAND PARTNERS, LIMITED. If the allegations could be substantiated, AUSA [REDACTED] advised that his office would consider Federal prosecution for violations of Title 18, United States Code, Sections 1014 and 1344.

b6
b7C

FBI

TRANSMIT VIA:

☐ Teletype
☐ Facsimile
☒ AIRTEL

PRECEDENCE:

☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:

☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 4/3/89

TO: DIRECTOR, FBI

FROM: SAC, DENVER (29A-4618) (P)

SILVERADO BANKING,
 SAVINGS AND LOAN ASSOCIATION,
 DENVER, COLORADO - VICTIM;
 BF&E
 OO: DENVER

b6
b7C

Reference Denver teletype to the Bureau, dated
 1/24/89, and various telcals between Denver SA [redacted]
 [redacted] and FBIHQ SSA [redacted]

b6
b7C

Enclosed for the Bureau are the original and five
 copies of a self explanatory LHM concerning above captioned
 matter. A copy of said LHM is being provided by separate
 cover to the U. S. Attorney's Office, Denver, Colorado.

For the information of the Bureau, Denver Division
 is instituting an investigation into the allegations
 concerning the financial demise of SILVERADO BANKING, SAVINGS
 AND LOAN ASSOCIATION. The Criminal Referral Form described
 in the enclosed LHM is the initial vehicle in which Denver
 Division will begin investigation concerning potential
 subjects. As the investigation ensues, continued liaison
 with FEDERAL HOME LOAN BANK BOARD Officials will hopefully
 develop additional targets worthy of Federal criminal
 prosecution.

2 - Bureau (Enc. 6)

② - Denver

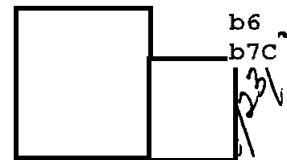
b6
b7C

Searched _____
 Serialized [redacted]
 Indexed _____
 Filed [redacted]

Approved: _____ Transmitted _____ Per _____
 (Number) (Time)

b6
b7C

29A-4618-10



2016-11-16-10

DN 29A-4618

For further information of the Bureau, no descriptive data is currently available concerning captioned individual as none was described in the criminal referral form, and a query of the DEPARTMENT OF PUBLIC SAFETY Motor Vehicle Records for the State of Texas could not be accomplished without an exact date of birth for captioned individual.

FBI

TRANSMIT VIA:

☐ Teletype
☐ Facsimile
☒ AIRTEL

PRECEDENCE:

☐ Immediate
☐ Priority
☒ Routine

CLASSIFICATION:

☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☒ UNCLAS E F T O
☐ UNCLAS

Date 4/13/89

TO: SAC, DENVER

FROM: SAC, PORTLAND (29A-2693)(RUC)

29-0-572 & 573, 29A-4618X, 29-0-467A
 Silverado Banking

SILVERADO BANKING SAVINGS
 AND LOAN ASSOCIATION,
 DENVER, COLORADO;
 BF&E
 (OO: Denver)

Re Portland teletype to FBIHQ, 1/19/89.

For the information of Denver, [redacted] (Protect
 Identity) was recontacted on 3/14/89 concerning [redacted]

b6
 b7C
 b7D

[redacted] advised [redacted]

b6
 b7C
 b7D

In view of the above, this matter is RUC.

2 - Denver
 1 - Portland

(3)

b6
 b7C

-1*-

29A-4618-11

Approved: [redacted]

Transmitted

(Number)

(Time)

Per

SEARCHED [redacted]

INDEXED [redacted]

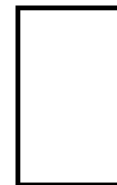
APR 17 1989

FOIMS SEARCH

NEG POS

DATE 4-17-89

b6
 b7C



b6
b7C

3/90

01

100

100

File - Serial Charge Out
FD-5 (Rev. 6-17-70)

File _____ Class. _____ Case No. _____ Last Serial _____ Date _____

☐ Pending

☐ Closed

Serial No. _____ Description of Serial _____ Date Charged _____

12 (News Articles)
13
14 Placed in
15
SUB-H

Permanent Charge out

Employee

RECHARGE

Date _____

To _____ From _____

Initials of Clerk { _____

Date { _____

Date charged

Employee

Location

✓DN 196B-2915

✓DN 29A-4618

-1-

A source provided

[Redacted]

b6
b7C
b7D

The source advised

[Redacted]

b6
b7C
b7D

29A-4618-16

SEARCHED INDEXED
SERIALIZED
FBI - DE

b6
b7C

b6
b7C
8/23/90

Date

9-25-89

To: ☐ Director

Att.: _____

FILE # _____

Title

RECLASSIFICATION OF BF&E

MATTERS

RE:

BUAIRTEL TO ALL SACS 9/8/89

☒ SAC DENVER
☐ ASAC _____
☐ Supv _____
☐ Agent _____
☐ OSM _____
☐ Rotor # _____
☐ Steno _____
☐ Typist _____
☐ M _____
Room _____

☐ Acknowledge
☐ Assign ☐ Reassign
☐ Bring file
☐ Call me
☐ Correct
☐ Deadline _____
☐ Delinquent
☐ Discontinue
☐ Expedite
☐ File

☒ For Information
☒ Handle
☐ Initial & return
☐ Leads need attention
☐ Open case
☐ Prepare lead cards
☐ Prepare tickler
☐ Recharge file ☐ serial
☐ Send to _____

☐ Return assignment card
☐ Return file ☐ serial
☐ Return with action taken
☐ Return with explanation
☐ Search and return
☐ See me
☐ Type

In accordance with instructions set forth in referenced airtel, the sub-classification of DNfile 29 A -DN- 4618 has been changed from A to D.

The correct Denver file number is currently 29 D -DN- 4618.

1 -
1 - DN 29 D -DN- 4618

29D-4618-17

b6
b7C

SAC ROBERT L. PENCE

Office DENVER

See reverse side

Memorandum



To : SAC, DENVER (29D-4618) (P)

Date 10/5/89

From : SA [REDACTED]

b6
b7C

Subject: [REDACTED]

SILVERADO BANKING, SAVINGS AND
LOAN ASSOCIATION,
Denver, Colorado - VICTIM
BF&E
OO: DENVER

For information, the loan that SILVERADO extended to [REDACTED] was the largest credit ever underwritten by SILVERADO. As a result of the default by the borrower [REDACTED] SILVERADO suffered a loss of \$41.4 as of 9/30/88. The loan commitment was to S. D. C. LAND PARTNERS, LTD., a Texas limited partnership of which the corporate general partner was SULLIVAN DEVELOPMENT COMPANY (SDC). SDC is an entity [REDACTED]
[REDACTED]

b6
b7C

The original loan commitment was in the amount of \$73.8 million, which loan commitment was to be secured by a second deed of trust on approximately 330 acres of undeveloped land in Fort Worth, Texas. This 330 acres of undeveloped land in Texas had an outstanding \$40 million first deed on it. The loan was closed on 3/27/87, pursuant to this outstanding commitment.

Approximately \$17.8 million in loan proceeds were to be used to purchase undivided junior and subordinated interests in a pool of SILVERADO loans. Additionally, the borrower was to receive \$23 million in cash at closing. Certain allegations have arisen that the proceeds of the disbursements made may subsequently have been used to establish trusts that were situated in the Grand Cayman Islands, and/or to extinguish borrowings on a line of credit which was used to fund the construction of [REDACTED] personal dwelling.

b6
b7C

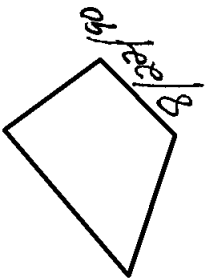
2 - Denver
[REDACTED]

29D-4618-18

OCT 5 1989

b6
b7C

18



On 6/8/88, SILVERADO officials notified the supervisory agent of the FEDERAL HOME LOAN BANK BOARD of a default on the \$73.8 million loan that SILVERADO had extended to [REDACTED]. This loan commitment had been funded to the amount of \$52 million, and the default occurred due to a failure by [REDACTED] to make a \$3 million payment on a \$36 million loan that had been received from FIRST REPUBLIC BANK, which bank had a prior position on the collateral that had secured SILVERADO's loan (the 330 acres of undeveloped land in Fort Worth, Texas).

b6
b7C

It has been learned that [REDACTED] has withheld a sales contract from SILVERADO's appraisers, which would have adversely impacted the appraisers assigned value to the 330 acres had they known about it. One clear consequence of a lower value of the property would have been a decrease in the amount of money SILVERADO would have lent on the project.

On 12/9/88, SILVERADO was placed into a receivership. To that date, due to the default by the borrower, SILVERADO had suffered a loss of \$41.4 million as of 9/30/88.

The above fact scenario has been presented and discussed with AUSA [REDACTED] who has requested further investigation to substantiate the aforementioned allegations against [REDACTED]. Also, SILVERADO, as previously mentioned, has failed, and has been reopened as COLUMBIA SAVINGS. It is believed that additional allegations will surface in this investigation concerning potential fraudulent activities on the behalf of SILVERADO officials which lead to the demise of SILVERADO as a viable financial institution.

b6
b7C

Writer has maintained continuous contact with AUSA [REDACTED] concerning the prosecutive and investigative strategy in which he wants writer to proceed. Information has been developed that [REDACTED] a former employee of SILVERADO, has information of interest concerning the [REDACTED] loan. [REDACTED] was employed by SILVERADO on a contract basis to do [REDACTED] and in that capacity, she had significant involvement in the [REDACTED] loan. There is presently no reason to believe that [REDACTED] has committed any act or omission which would lead to potential administrative or criminal proceedings against her, yet she has retained an attorney in Houston, Texas, who has indicated that before [REDACTED] will

b6
b7C

make a proffer of the evidence she has, she wants an immunity agreement. [redacted] through her attorney, has indicated that she wants use immunity both by the U. S. ATTORNEY'S OFFICE in Denver, Colorado, and the office of enforcement of the FEDERAL HOME LOAN BANK BOARD in Washington, D. C. Discussions between writer and AUSA [redacted] have indicated [redacted]

b5
b6
b7C

[redacted] However, discussions during late September of 1989 between writer and AUSA [redacted] have determined [redacted]

[redacted] AUSA [redacted]

Additional investigation conducted by writer has determined that the law firm of HOPKINS AND SUTTER has been hired by the FEDERAL SAVINGS AND LOAN INSURANCE CORPORATION to look into civil remedies against the former officers and directors of SILVERADO on a breach of fiduciary duty theory. Writer is attempting to contact [redacted] of HOPKINS AND SUTTER to determine the exact civil investigation that his law firm has been hired to do. This is important in the criminal investigation in that any depositions taken by attorneys for HOPKINS AND SUTTER may shed tremendous light in regards to the culpability of former officers and directors of SILVERADO. [redacted] can be reached at [redacted] and an additional attorney by the name of [redacted] at that law firm, may have additional information concerning SILVERADO. [redacted] can be reached at [redacted]

b6
b7C

Writer is also attempting to speak with [redacted] Attorney in the enforcement section for the OFFICE OF THRIFT SUPERVISION (formerly FEDERAL HOME LOAN BANK BOARD OF WASHINGTON D. C.) who has information concerning the [redacted] loan. Attempt to telephonically contact [redacted] have met with negative results, as he travels frequently.

b6
b7C

DN 29D-4618

LEADS:

DENVER DIVISION

AT DENVER, COLORADO

1) Will maintain contact with AUSA [redacted] concerning his contact with the attorney for [redacted] who can provide substantial information on the [redacted] loan.

b6
b7C

2) Will contact [redacted] Attorney, OFFICE OF THRIET SUPERVISION, Washington, D. C., business telephone number [redacted] to determine the exact nature of the information he possesses on the [redacted] loan.

b6
b7C

3) Will contact either [redacted] or [redacted] of the law firm of HOPKINS AND SUTTER in Chicago, Illinois, to determine the exact nature of the work they have performed for the FEDERAL SAVINGS AND LOAN INSURANCE CORPORATION concerning SILVERADO.

b6
b7C

File - Serial Charge Out
FD-5 (Rev. 6-17-70)

File _____ Class. _____ Case No. _____ Last Serial _____ Date _____

☐ Pending

☐ Closed

Serial No. _____ Description of Serial _____ Date Charged _____

19
19x1 (News Articles)
19x2
19x3 placed in
19x4
19x5 SUB-H

Permanent Chargeout

Employee _____

RECHARGE

Date _____

To _____ From _____

Initials of Clerk { _____

Date { _____

Date charged _____

Employee _____

Location _____



U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to
File No.

1823 Byron G. Rogers
Federal Office Building
Denver, Colorado 80202

December 15, 1989

[Redacted]
Federal Deposit Insurance Corporation
1125 17th Street, Suite 700
Denver, Colorado 80202

b6
b7C

Dear [Redacted]

We have reason to believe that a criminal act transpired at Silverado Savings based upon information received from the Federal Home Loan Bank Board on February 16, 1989, indicating that [Redacted] possibly violated Federal statutes in his transactions with Silverado Savings.

b6
b7C

Due to the [Redacted] transaction and others yet unknown, on December 9, 1988, Silverado Savings was placed into receivership.

The FBI would like to establish a relationship with your agency to exchange information as well as the opportunity to review pertinent records regarding criminal acts involving Silverado Savings while it was a viable institution.

Sincerely yours,

Robert L. Pence
Special Agent in Charge

By: [Redacted]
Supervisory Special Agent

b6
b7C

1 - Addressee
2 - 29D-4618-1

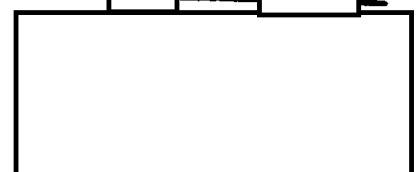


REASSIGNED TO
12-15-89

Searched [Redacted]
Serialized [Redacted]
Indexed [Redacted]
Filed [Redacted]

b6
b7C

29D-4618-20



29D-4618-21

(K)

SEARCH
SERIAL

NO
FILE

DEC 2 1988

FBI - DENVER

(INFO)

b6
b7C

File - Serial Charge Out
FD-5 (Rev. 6-17-70)

File _____ Class. _____ Case No. _____ Last Serial _____ Date _____
☐ Pending ☐ Closed
Serial No. _____ Description of Serial _____ Date Charged _____

Serial 21X1 + 21X2
(news articles) placed
in SUB-H

Permanent Charge out

Employee _____

RECHARGE

Date _____

To _____ From _____

Initials of
Clerk {

Date {

Date charged _____

Employee _____

Location _____

File - Serial Charge Out
FD-5 (Rev. 6-17-70)

File 29D 4618 Date 8-16-90
Class. Case No. Last Serial

/ / Pending / / Closed Date

Serial No.	Description of Serial	DATE CHARGED
<u>22</u>	<u>Subpoena</u>	<u>8-16-90</u>
	<u>now located in</u>	
	<u>29D - 4618 Sub F - 10</u>	
	PERMANENT CHARGE OUT	
	DO NOT REMOVE OR DESTROY	

PERMANENT CHARGE OUT
DO NOT REMOVE

DN-029D-0004618

SERIAL: 22

SERPGQ02 b7E

ENTERED: 01/25/90
MODIFIED:

VIOL: BFE

ASGD: [REDACTED]

b6
b7C

TITLE: SILVERBANK; [REDACTED]
[REDACTED]

TO: [REDACTED]
FROM: DENVER

DATED: 12/12/89

b6
b7C

TYPE: SUBPOENA

RE:

CLASSIFICATION: SN CLASSIFIED BY:

DECLASSIFY ON:

<GO> - CONTINUE F1 - REQUERY F8 - DELETE F10 - SERIAL MENU
F2 - SUMMARY SCREEN F9 - MODIFY SHIFT-F10 - FOIMS MENU

4β

- 32

Memorandum



To : SAC, DENVER (29D-4618)(P)

Date 1/16/90

From : SA [REDACTED]

b6
b7C

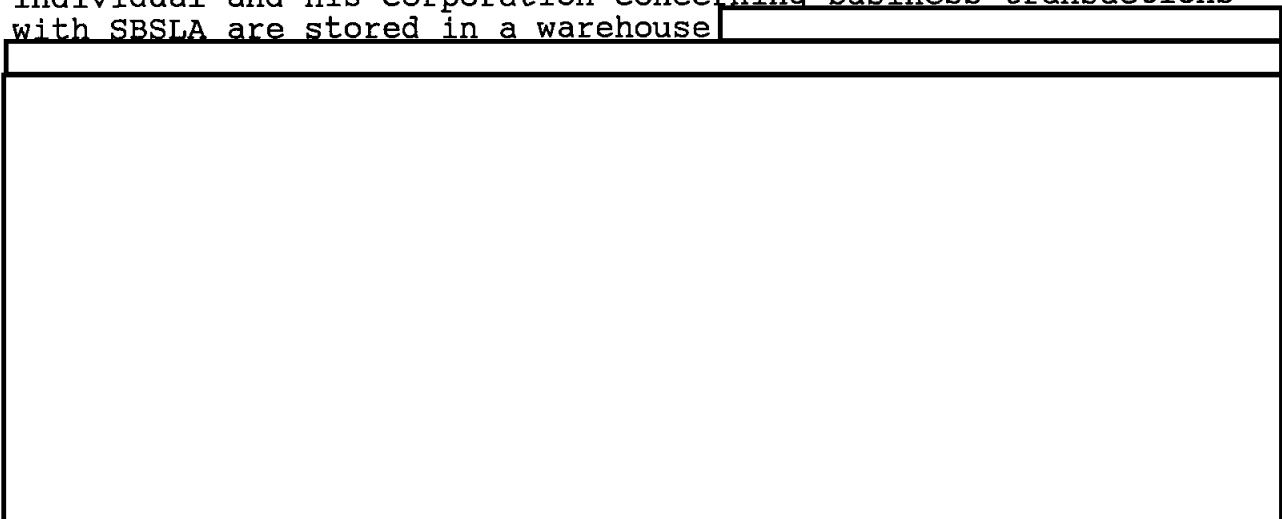
Subject: [REDACTED]

✓SILVERADO BANKING SAVINGS
AND LOAN ASSOCIATION,
DENVER, COLORADO;
BF&E;
OO: DENVER

The purpose of this memorandum is to document a meeting that was convened on 12/15/89, in the offices of the FEDERAL DEPOSIT INSURANCE CORPORATION (FDIC), 1125 17th Street, Suite 700, Denver, Colorado.

The above meeting was convened by the FEDERAL BUREAU OF INVESTIGATION (FBI) to establish a relationship with the FDIC to exchange information, as well as the opportunity to review pertinent records and documents regarding potential criminal acts which may have transpired at SILVERADO BANKING SAVINGS AND LOAN ASSOCIATION (SBSLA) while it was a viable institution. Officials from the FDIC at that meeting, advised that the records for the captioned institution and the records for the captioned individual and his corporation concerning business transactions with SBSLA are stored in a warehouse [REDACTED]

b6
b7C
b7E



② - Denver



29D-4618-23

SEARCHED	INDEXED
SERIALIZED	FILED
JAN 23 1990	
FBI - DENVER	

b6
b7C

b6
b7C

8/19/90

65
10

For additional information, the following individuals were present at the meeting on 12/15/89:

1. [REDACTED] - FBI.
2. [REDACTED] - FBI.
3. [REDACTED] - FBI.
4. [REDACTED] - UNITED STATES ATTORNEY'S OFFICE.
5. [REDACTED] - FDIC-Office of General Council
(Criminal).
6. [REDACTED] - FDIC-Washington, D. C.
7. [REDACTED] - FDIC-Denver [REDACTED]
8. [REDACTED] - FDIC-Denver [REDACTED]

b6
b7C

b6
b7C

Memorandum



To : SAC, DENVER (29D-4618) (P)

Date 1/23/90

From : SA [REDACTED]

b6
b7C

Subject : [REDACTED]

✓ SILVERADO BANKING SAVINGS AND LOAN ASSOCIATION
BF & E
OO : DENVER

On January 22, 1990, writer contacted [REDACTED]
[REDACTED] Federal Deposit Insurance Corporation, 1125
17th Street Suite 700, Denver, Colorado telephone [REDACTED]

b6
b7C
b7E

On January 30, 1990, [REDACTED]

b6
b7C
b7E

It is to be noted that a description for [REDACTED]
[REDACTED] has not been entered into the Denver Division
computerized indices. A review of the file indicates no
discription of [REDACTED] is available. Effort was made
through the Department of Motor Vehicles in Texas to search
Driver's License records and no review could take place
without a date of birth.

b6
b7C

LEAD

DENVER: Will maintain contact with [REDACTED]
[REDACTED] at FDIC.

2 - Denver

29D-4618-24

SEARCHED	INDEXED
SERIALIZED	FILED
JAN 28 1990	
FBI - DENVER	

b6
b7C

b6
b7C

A small square box containing handwritten initials, possibly "JL" or "SL", with a checkmark-like mark to its right.

b6
b7C

File - Serial Charge Out
FD-5 (Rev. 6-17-70)

File _____ Class. _____ Case No. _____ Last Serial _____ Date _____
☐ Pending ☐ Closed
Serial No. _____ Description of Serial _____ Date Charged _____

Serial 25 (news article)
placed in 57B-H

Permanent Chargeout

Employee

RECHARGE

Date _____

To _____ From _____

Initials of
Clerk {

Date {

Date charged

Employee

Location

290-4618-26

(X)

SEARCHED SERIALIZED	[REDACTED]	INDEXED FILED	[REDACTED]
JAN 19 199			
FBI - DENVER			

b6
b7C

b6
b7C

1/22/90

Memorandum



To : SAC, DENVER (29D-4618)(P)

Date 1/31/90

From : SA [REDACTED]

b6
b7C

Subject: [REDACTED]

Former President and Chairman of the Board;
ET AL;
SILVERADO BANKING, A SAVINGS & LOAN ASSOCIATION,
Denver, Colorado - VICTIM
BF&E
(OO:DN)

Sub-File

Description

A
B
C
D
E
F
G

SDC LAND PARTNERS, INC
CHAMBERS-TOWERS #1

1 - Denver

(2 - 29D-4618)

(1 - SA [REDACTED])

(1 - SA [REDACTED])

(1 - SA [REDACTED])

(1 - [REDACTED])

(1 - AOSM - RECORDS)



29D-4618-27

SEARCHED	INDEXED
SERIALIZED	FILED
JAN 31 1990	

[REDACTED]

b6
b7C

(X)

b6
b7C

0/22/90

Memorandum



To : SAC, DENVER (29D-4618) (P)

Date 1/31/90

From : SA [REDACTED]

b6
b7C

Subject : CHANGED

[REDACTED] FORMER VICE
PRESIDENT AND DIRECTOR;

b6
b7C

[REDACTED]
[REDACTED] FORMER
VICE PRESIDENT AND DIRECTOR;

[REDACTED] FORMER PRESIDENT
AND CHAIRMAN OF THE BOARD

✓ SILVERADO BANKING SAVINGS AND LOAN ASSOCIATION

BF & E

OO : DENVER

Title is being marked CHANGED to include the
name and positions of [REDACTED]
FORMER VICE PRESIDENT AND DIRECTOR; [REDACTED]
FORMER VICE PRESIDENT AND DIRECTOR; [REDACTED]
FORMER PRESIDENT AND CHAIRMAN OF THE BOARD in the title.
Title previously carried as [REDACTED]
[REDACTED] SILVERADO BANKING SAVINGS AND LOAN
ASSOCIATION.

b6
b7C

Sub files are being opened in this case to
separate investigation in different individuals involved
in the demise of Silverado.

2 - Denver

(Y)

29D-4618-28

SEARCHED	INDEXED
SERIALIZED	FILED
JAN 31 1990	

b6
b7C

b6
b7C
8/22/90

52

DN-029D-0004618

SERIAL: 29

SERPGQ02

ENTERED: 02/05/90
MODIFIED:

VIOL: BFE

ASGD:

TITLE: SILVERBANK:

b6
b7C

TO:

FROM: DENVER

DATED: 01/30/90

TYPE: SUBPOENA

RE:

CLASSIFICATION: SN CLASSIFIED BY:

DECLASSIFY ON:

<GO> - CONTINUE

F1 - REQUERY

F8 - DELETE

F10 - SERIAL MENU

F2 - SUMMARY SCREEN

F9 - MODIFY

SHIFT-F10 - FOIMS MENU

4β

32



U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to
File No.

1823 Byron G. Rogers
Federal Office Building
Denver, Colorado 80202

January 31, 1990



b3
b6
b7C

Dear Sir:

Please find enclosed a subpoena 

b3

If you have any questions, please contact either
Assistant U.S. Attorney  at telephone 
 or Special Agent  of this office at telephone 

b6
b7C

Thank you for your cooperation.

Sincerely yours,

Robert L. Pence
Special Agent in Charge

By: 
Supervisory Special Agent

b6
b7C

ENCLOSURE

1 - Addressee
1 - Denver (29D-4618)(P)

(2)



29D-4618-30
Searched 

Serialized 

Indexed 

Filed 

b6
b7C

(X)



b6
b7C

8/22/90

File - Serial Charge Out
FD-5 (Rev. 6-17-70)

File 29D-4618 Date 8-16-90
Class. Case No. Last Serial

/ / Pending

/ / Closed

Date

Serial No.	Description of Serial	DATE CHARGED
<u>29</u>	<u>Subpoena</u>	<u>8-16-90</u>
	<u>now located in</u>	
	<u>29D-4618 Sub F - 9</u>	
	PERMANENT CHARGE OUT	
	DO NOT REMOVE OR DESTROY	

PERMANENT CHARGE OUT
DO NOT REMOVE

File - Serial Charge Out
FD-5 (Rev. 6-17-70)

File _____ Class. _____ Case No. _____ Last Serial _____ Date _____

☐ Pending

☐ Closed

Serial No. _____ Description of Serial _____ Date Charged _____

Serial 30x1 (news
article) placed
in SUB-H

Permanent Charge-Out

Employee _____

RECHARGE

Date _____

To _____ From _____

Initials of
Clerk {

Date {

Date charged _____

Employee _____

Location _____

File - Serial Charge Out
FD-5 (Rev. 6-17-70)

File _____ Class. _____ Case No. _____ Last Serial _____ Date _____
☐ Pending ☐ Closed
Serial No. _____ Description of Serial _____ Date Charged _____

Serial 30x2
(news article) placed
in SUB-H

Permanent Charge-Out

Employee _____

RECHARGE

Date _____

To _____ From _____

Initials of
Clerk {

Date {

Date charged _____

Employee _____

Location _____

File - Serial Charge Out
FD-5 (Rev. 6-17-70)

File _____ Class. _____ Case No. _____ Last Serial _____ Date _____
☐ Pending ☐ Closed
Serial No. _____ Description of Serial _____ Date Charged _____

Serial 30 x 3 (news
article) placed
in SUB-H

Permanent Charge-Out
Employee

RECHARGE

Date _____

To _____ From _____

Initials of Clerk { _____

Date { _____

Date charged _____

Employee _____

Location _____

File - Serial Charge Out
FD-5 (Rev. 6-17-70)

File _____ Class. _____ Case No. _____ Last Serial _____ Date _____
☐ Pending ☐ Closed
Serial No. _____ Description of Serial _____ Date Charged _____

Serial 30 x 4 (news article)
placed in SUB-H

Permanent Charge-Out

Employee _____

RECHARGE

Date _____

To _____ From _____

Initials of Clerk { _____

Date { _____

Date charged _____

Employee _____

Location _____

FEDERAL BUREAU OF INVESTIGATION

1/30/90

Date of transcription

STANLEY SALL, date of birth September 25, 1924, 4210 Ridgeline Drive, Colorado Springs, Colorado, voluntarily appeared at the Colorado Springs Resident Agency. SALL is a retired building contractor, having spent most of his career in the Colorado Springs area. After being advised of the identity of the interviewing Agent and the nature of the interview, SALL provided the following information:

In August 1988, SALL advised he became aware of problems with SILVERADO SAVINGS AND LOAN ASSOCIATION (SSLA) through an acquaintance, [redacted] of Colorado Springs. [redacted] advised SALL that SSLA was currently having financially problems and was in danger of failing. At that time SALL had \$300,000.00 in Certificates of Deposit (CD) with SSLA. He became concerned and on August 3, 1988, visited the Manager of the Colorado Springs branch office, [redacted]. At this meeting, SALL asked [redacted] about the financial situation of SSLA. [redacted] responded that SSLA was indeed solvent and furthermore assured him that the savings and loans was currently meeting regulatory standards.

b6
b7C

SALL continued the conversation with [redacted] and stated that he subsequently demanded that SSLA cash out his CDs. He advised that at that particular time his CDs were not due to mature for another three months. [redacted] excused herself and called an officer at the Denver headquarters of SSLA and explained the problem. According to SALL the individual called by [redacted] was (First Name Unknown) [redacted]. He advised that the conversation between [redacted] took quite a long time and eventually [redacted] was given permission to cash out the CDs. SALL stated that he received a check for the face amount of the CDs, \$300,000.00, and was not charged a penalty for early withdrawn of the CDs. He went on to explain that the interest which the CDs had earned was currently being paid into a separate account with SSLA and the interest due him was paid up to date. He stated, however, as the withdrawal date was August 3, 1988, he only received interest on the CDs up through July 1988.

b6
b7C

SALL stated the last known address for [redacted] is [redacted] Colorado Springs, Colorado. He advised, to his knowledge, [redacted] has recently lost his home, and therefore does not know his current address.

b6
b7C

Investigation on 1/29/90 at Denver, Colorado		29D-4618 - 3/	
by SA [redacted]	Date dictated	SEARCHED [redacted]	INDEXED [redacted]
		SERIALIZED [redacted]	FILED [redacted]
		1/20/90	
		FEB 02 1990	

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

b6
b7C

b6
b7C

8/22/70

February 1, 1989

Federal Home Loan Bank Board
Federal Savings and Loan Insurance Corp.
1349 Empire Central
Dallas, Texas 75247

Gentlemen:

This office represents Stanley Sall, trustee, and [redacted] concerning certificates of deposit numbers [redacted] and [redacted]. Copies of said certificates of deposit are attached hereto as Exhibits A and B.

b6
b7C

As can be seen from the certificates, they matured on August 10, 1987, and were renewed following that date. At the beginning of May, 1988, my client spoke with [redacted] who was a local representative of Silverado Savings and Loan concerning the financial condition of Silverado. She indicated that Silverado was solvent and in good financial shape. As a result of said representation, my clients kept the enclosed certificates with Silverado Savings. The new maturity date of these certificates was then six months, expiring on November 2, 1988.

b6
b7C

In early August, 1988, my clients were provided with several newspaper articles outlining the insolvency of Silverado Savings. They immediately contacted Silverado and demanded return of their money and insisted on no penalty being assessed due to the misrepresentations made by [redacted].

b6
b7C

Up until that time, my client had received interest on a monthly basis on the certificates. Silverado however refused to pay interest on the accounts for August, 1988. The amount of interest on said certificates is \$174.00.

Therefore let this letter serve as demand upon Silverado and FSLIC for payment of \$174.00, representing the interest on the two certificates of deposit for the first five days of August, 1988.

Sincerely yours,

[redacted]
Attorney at Law, P.C.

b6
b7C

[redacted]
1-1-89
10-1-89



b6
b7C



8/27/00

Memorandum



To : SAC, DENVER (DB 29D-4618) (P)

Date 2/12/90

From : SA [redacted]

b6
b7C

Subject: INFORMATION REGARDING SILVERADO -
LINCOLN SAVINGS AND LOAN INVESTIGATION

On February 12, 1990, [redacted]

b6
b7C

[redacted] Denver, Colorado, telephonically contacted writer regarding an article in Sunday's newspaper regarding the SILVERADO - LINCOLN SAVING AND LOAN investigation. [redacted] has done appraisal work for several of the persons/companies involved in the investigation. Specifically, [redacted] has done work for R. A. HOMES, [redacted] SILVERADO ELECTRA, and AMCOR WATERFARM. [redacted] stated he is willing to allow investigators to review [redacted] files regarding the aforementioned companies.

Writer requests that any Agents contacting [redacted] contact SA [redacted] beforehand.

b6
b7C

2 - Denver

(2)

29D-4618-32

SEARCHED	INDEXED
SERIALIZED	FILED
FEB 14 1990	
FBI - DEN	

b6
b7C

File - Serial Charge Out
FD-5 (Rev. 6-17-70)

File _____ Class. _____ Case No. _____ Last Serial _____ Date _____
☐ Pending ☐ Closed
Serial No. _____ Description of Serial _____ Date Charged _____

Serial 33 (news article)

placed in SUB-H

Permanent Charge-Out
Employee _____

RECHARGE

Date _____

To _____ From _____

Initials of Clerk {

Date {

Date charged

Employee

Location

[redacted] b6
[redacted] b7C

8/22/90

11

210

File - Serial Charge Out
FD-5 (Rev. 6-17-70)

File _____ Class. _____ Case No. _____ Last Serial _____ Date _____
☐ Pending ☐ Closed
Serial No. _____ Description of Serial _____ Date Charged _____

Serial 35 (news article)

placed in SUB-H

Permanent Charge-Out

Employee

RECHARGE

Date _____

To _____ From _____

Initials of Clerk { _____

Date { _____

Date charged

Employee

Location

File - Serial Charge Out
FD-5 (Rev. 6-17-70)

File _____ Class. _____ Case No. _____ Last Serial _____ Date _____
☐ Pending ☐ Closed
Serial No. _____ Description of Serial _____ Date Charged _____

Serial 36 (news article)
placed in SUB-H

Permanent Charge-Out

Employee

RECHARGE

Date _____

To _____ From _____

Initials of
Clerk {

Date {

Date charged

Employee

Location

File - Serial Charge Out
FD-5 (Rev. 6-17-70)

File _____ Class. _____ Case No. _____ Last Serial _____ Date _____

☐ Pending

☐ Closed

Serial No. _____

Description of Serial _____

Date
Charged _____

*Serial 37 (news article)
placed in SUB H*

Permanent Charge-Out

Employee _____

RECHARGE

Date _____

To _____ From _____

Initials of
Clerk {

Date {

Date charged _____

Employee _____

Location _____

File - Serial Charge Out
FD-5 (Rev. 6-17-70)

File _____ Class. _____ Case No. _____ Last Serial _____ Date _____
☐ Pending ☐ Closed
Serial No. _____ Description of Serial _____ Date Charged _____

Serial 37X2 (news
article) placed in
SUB H

Permanent Charge-Out
Employee _____

RECHARGE

Date _____

To _____ From _____

Initials of Clerk { _____

Date { _____

Date charged _____

Employee _____

Location _____

29D-4618-37x3

SEARCHED	INDEXED
SERIALIZED	FILED
FEB 21 1990	
FBI - DE	



b6
b7C

ORIG-S2B D

8/22/90

b6
b7C

8

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 2/15/90

[redacted] (PROTECT IDENTITY), [redacted]
[redacted] was interviewed at
his place of employment. After being advised of the identity of
the interviewing Agent and the nature of the interview [redacted]
furnished the following information:

b6
b7C
b7D

[redacted]

b6
b7C
b7D

[redacted]

b6
b7C
b7D

Investigation on 1/12/90 at [redacted] File # 29D-4618
by SA [redacted] Date dictated 1/25/90

b6
b7C
b7D

29D-4618

Continuation of FD-302 of , On 1/12/90, Page 2 b6
b7C
b7D

b6
b7C
b7D

29D-4618

Continuation of FD-302 of , On 1/12/90, Page 3 b6
b7C
b7D

File - Serial Charge Out
FD-5 (Rev. 6-17-70)

File _____ Class. _____ Case No. _____ Last Serial _____ Date _____
☐ Pending ☐ Closed
Serial No. _____ Description of Serial _____ Date Charged _____

Serial 37X4 (news
article) placed in
SUB H

Permanent Charge Out

Employee _____

RECHARGE

Date _____

To _____ From _____

Initials of
Clerk {

Date {

Date charged _____

Employee _____

Location _____

Memorandum



To : SAC, DENVER (29D-4618)(P)

Date 2/23/90

From : SA [REDACTED]

b6
b7C

Subject : [REDACTED] FORMER
PRESIDENT AND CHAIRMAN OF
THE BOARD
SILVERADO BANKING, SAVINGS AND
LOAN ASSOCIATION
ET AL
BF & E
OO : DENVER

On 2/21/90, writer met with Assistant United
States Attorney [REDACTED]
[REDACTED] both of [REDACTED] in
Washington, D. C. concerning captioned matter.

b3
b6
b7C

[REDACTED] reviewed the documents collected, to
date, in this case and gave a presentation of the criminal
referrals furnished to the FBI, Denver.

She advised that [REDACTED]

b3
b6
b7C

She will be available in the future for any
problems and/or questions which could result concerning
[REDACTED]

b3

2 - Denver
[REDACTED]

29D-4618-38

SEARCHED	INDEXED
SERIALIZED	FILED
FEB 23 1990	

[REDACTED]

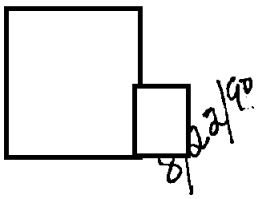
(X)

b6
b7C

b6
b7C

8/21/90

26



b6
b7C

23

File - Serial Charge Out
FD-5 (Rev. 6-17-70)

File _____ Date _____
Class. _____ Case No. _____ Last Serial _____
☐ Pending ☐ Closed
Serial No. _____ Description of Serial _____ Date Charged _____

Serial 40 (news article)
placed in SUB H

Permanent Charge-Out

Employee _____

RECHARGE

Date _____

To _____ From _____

Initials of Clerk {

Date {

Date charged _____

Employee _____

Location _____